



DEREK SMITH
LAW GROUP, PLLC
Employment Lawyers Representing Employees Exclusively

May 28, 2020

VIA ECF

Honorable Alvin K. Hellerstein, U.S. District Court Judge
United States District Court, Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

RE: Michael Dimas v. Francios Payard, LLC, et al.
Civ. No. 18-cv-07873

Dear Judge Hellerstein:

We represent Plaintiff, Michael Dimas, in the above-referenced action. I write to Your Honor to request an extension of the date to submit the documentation necessary to substantiate Plaintiff's claimed damages per Your Honor's order in ECF Docket entry #67 of this matter. Plaintiff requests an extension of sixty (60) days from the current date of 6/2/2020 to 8/2/2020.

This is the second request for a 60-day extension due to the Coronavirus State of Emergency. The on-going operational disruption caused by the COVID-19 outbreak has prevented Plaintiff's counsel from being able to compile all of verified documents necessary to comply with Your Honor's order. Our firm's office, where Plaintiff's hard file is located containing copies of the documents and notes necessary to fully comply with Your Honor's order, has remained closed since March 2020 and is not expected to be accessible by Plaintiff's counsel until mid-to-late July 2020.

Additionally, because of the disruption the Coronavirus has caused in the City, I also respectfully request to be excused from delivering a hardcopy of this letter to the Courthouse at 500 Pearl Street, as required in Your Honor's Individual Rules.

Thank you for your consideration in this matter.

Respectfully submitted,

Seamus P. Barrett, Esq.

New York City Office: One Penn Plaza, Suite 4905, New York, NY 10119 | (212) 587-0760
Philadelphia Office: 1845 Walnut Street, Suite 1600, Philadelphia, PA 19103 | (215) 391-4790
New Jersey Office: 73 Forest Lake Drive, West Milford, NJ 07421 | (973) 388-8625
Website: www.discriminationandsexualharassmentlawyers.com